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February 25, 2014

By ECF

The Honorable James C. Francis, IV,
U.S. District Court for the
Southern District of New York,
500 Pearl Street,
New York, NY 10007-1312.

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Re: Chen-Oster et ano. v. Goldman, Sachs & Co. et ano.,

No. 10 Civ. 6950

Dear Judge Francis:

In a February 18, 2014 Memo Endorsement placed at the end of Defendants' counsel's February 14, 2014 letter to the Court, Your Honor directed the parties jointly to propose a schedule for briefing the motions to strike certain portions of expert rebuttal reports that were the subject of Defendants' counsel's February 14 letter. The parties have conferred and propose jointly the following schedule: Defendants' motions to be filed March 7, 2014; Plaintiffs' opposition papers to be filed March 17, 2014; and Defendants' reply papers to be filed March 24, 2014.

We appreciate Your Honor's consideration.

Respectfully yours,

Berbara &

Barbara Berish Brown

of PAUL HASTINGS LLP

cc: Plaintiffs' counsel (By electronic mail)

Theodore O. Rogers, Jr.
of SULLIVAN & CROMWELL LLP

This proposed schedule for motions concerning expert rebuttal reports is separate from *Daubert* motions that either side may feel the need to file after seeing the class certification submissions filed by the other.